



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Shirley Miller, Treasurer
RJR Political Action Committee; RJR Nabisco,
Inc.
P.O. Box 718
Winston-Salem, NC 27102

MAR - 3 1999

Identification Number: C00042002

Reference: 30 Day Post-General Report (10/15/98-11/23/98)

Dear Ms. Miller:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 23 of your report discloses a contribution(s) to "8 in '98". Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

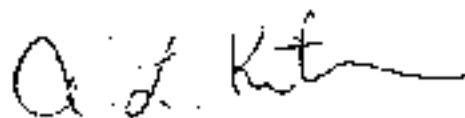
-Schedule B of your report discloses a \$1,326.00 payment to your connected organization for Reimbursement of admin. Exp. For TN contributions (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization and disclose this information on Schedule B supporting Line 21(b) of the Detailed Summary Page. Line 29 is to be used when making

contributions to non-federal candidates and committees. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. L. Kitchen".

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 12 of 12
For Line Number 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RJR Political Action Committee

C00042002

| Full Name, Mailing Address and Zip Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|----------------------------|---|
| Minear for Senate Committee HC 64, Box 83 Parsons, WV 26287 | Sarah Minear R- /WV Senate 1998 General | 10/26/98 | 250.00 |
| Committee to Elect Delegate Louisos 148 Church Street Oak Hill, WV 25901 | Tom Louisos D-29/WV House 1998 Primary | 04/22/98 | (75.00) |
| Committee to Elect Delegate Seacrist 805 Litz Drive Charleston, WV 25311 | Rudy Seacrist D- /WV House 1998 General | 10/26/98 | 200.00 |
| Committee to Reelect Joe F. Smith 1860 Loudon Heights Road Charleston, WV 25314 | Joe F. Smith D-30/WV House 1998 General | 10/26/98 | 150.00 |
| Committee to Elect Delegate Spencer 17 East Fern Road Charleston, WV 25314 | Sharon Spencer D-30/WV House 1998 General | 10/26/98 | 150.00 |
| Committee to Elect Delegate White 1810 National Road, A2-302 Wheeling, WV 26003 | L. Gil White R- /WV House 1998 General | 10/26/98 | 150.00 |
| Democratic Legislative Council P. O. Box 11035 Charleston, WV 25339 | 1998 General | 10/26/98 | 500.00 |
| R. J. Reynolds Tobacco Company P. O. Box 2959 Winston-Salem, NC 27102 | Reimbursement of admin. exp. for TN contributions | 10/20/98 | 1,326.00 |

AK

Subtotal of Disbursements This Page (optional)

2,651.00

Total This Period (last page this line number only)

38,301.00

